

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

United States of America,

v.

Angelo Alvarado,
Darryl Henderson, and
Jonathan Rios,

Defendants.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 2/13/2020

~~PROPOSED~~
PROTECTIVE ORDER

20 Cr. 91 (LGS)

WHEREAS, the United States of America seeks to provide in unredacted form certain documents pursuant to Rule 16 of the Federal Rules of Criminal Procedure; and

WHEREAS, some material that the Government seeks to provide contains sensitive information, including identification information, related to specific individuals; and

WHEREAS, the Government is willing, under the conditions set forth below, to produce such materials;

IT IS HEREBY agreed, by and between the United States of America, Geoffrey S. Berman, United States Attorney, by Danielle M. Kudla, Assistant United States Attorney, and defendants Angelo Alvarado, by and through his attorney, Jennifer Willis; Darryl Henderson, by and through his attorney, Jean D. Barrett; and Jonathan Rios, by and through his attorney, Richard Palma, that:

1. Any material reflecting sensitive identification information (including, names, addresses, dates of birth, Social Security numbers, driver's license information, bank account information, email addresses, and telephone numbers) produced by the Government in this action is deemed "Confidential Information" and shall be so identified by the Government.

2. Confidential Information disclosed to the defendants or to their counsel during the course of proceedings in this action:

(a) Shall be used by the defendants and their counsel only for purposes of the defense of this action;

(b) Shall be maintained in a safe and secure manner solely by the defendants' counsel; shall not be possessed by the defendants, except in the presence of the defendants' counsel; and shall not be disclosed in any form by the defendants or their counsel except as set forth in paragraph 2(c) below;

(c) May be disclosed by the defendants or their counsel only to the following persons (hereinafter "Designated Persons"):

(i) investigative, secretarial, clerical, and paralegal student personnel, or any interpreter or translator, employed full-time or part-time by the defendants' counsel;

(ii) independent expert witnesses, investigators, or advisors retained by the defendants' counsel in connection with this action;

(iii) such other persons as hereafter may be authorized by the Court upon motion by the defendants; and

(d) Shall either be returned to the Government following the conclusion of the trial of the above-referenced action or upon the defendants' sentencing or upon the conclusion of any appeals, or maintained by defendants' counsel as required by counsel's duties and responsibilities as counsel, as the case may be, provided that defendants' counsel maintain the Confidential Information in accordance with Paragraph 2(b).

3. The defendants and their counsel shall provide a copy of this Order to Designated Persons to whom they disclose Confidential Information pursuant to paragraph

By: J. D. Barrett

Jean D. Barrett, Esq.
Counsel for Defendant Darryl Henderson

Date: 2/12/20

By: R. Palma

Richard Palma, Esq.
Counsel for Defendant Jonathan Rios

Date: 02-12-2020

SO ORDERED:

Dated: New York, New York
February __, 2020

THE HONORABLE LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE
SOUTHERN DISTRICT OF NEW YORK